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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)
)
Federal-State Joint) CC Docket No. 96-45
Board on Universal) (Report to Congress)
Service)

Comments of General Communication, Inc.

General Communication, Inc. (GCI) hereby submits comments on Commission's Request for Comments.¹ The Common Carrier Bureau seeks information on the extent to which the Commission's decisions regarding universal service are consistent with the Telecommunications Act of 1996 (1996 Act). GCI offers the following comments on the Commission's Report and Order² adopted on May 8, 1997 and subsequent Orders.

Introduction

Pursuant to the 1996 Act, any universal service mechanism must be competitively neutral both in its collection and distribution of funds. Further, any system must mandate the deployment of technology and services only where market forces do not meet the Commission's objectives.

¹Common Carrier Seeks Comment for Report to Congress On Universal Services Under the Telecommunications Act of 1996, DA 98-2, released January 5, 1998.

²In the Matter of Federal-State Joint Board on Universal Service, CC Docket 96-45, FCC 97-157, 62 Fed. Reg. 32,862 (June 17, 1997).

Or 11

This is outlined by the 1996 Act which provides

for a pro-competitive, de-regulatory national policy framework designed to accelerate rapidly private sector deployment of advanced telecommunications and information technologies and services to all Americans by opening all telecommunications markets to competition.³

Allowing competition to expand is the key to this goal. Not allowing competition or creating barriers to entry, especially in rural areas, will create a system of have and have nots with rural America becoming the have nots. Choosing to protect the incumbent carrier from competition was not the intent of Congress, even in rural America. Consumers in all areas of the country must be allowed to choose their local carrier, pay lower rates, and have new technology deployed quickly and efficiently.

Congress' intent is to promote the revolutionary deployment of new technology and advanced services by all providers. Practices created in a monopoly environment cannot continue. The system adopted by the Commission for universal service for rural providers is the first step in many the Commission will take to make the universal service system work in a competitive environment. The process has been modified to make the support "sufficient, specific and predictable" and will continue to be modified as outlined in the 1996 Act. Congress and the Commission should not allow state regulators to determine that universal service

³Conference Report at 1.

support as outlined today does not meet the goals of the 1996 Act.

The Commission cannot assume that competition will not occur in rural areas. In fact, the Commission should encourage all providers to serve rural America so that everyone receives the benefits of competition. In the past, when the incumbent carriers were the direct beneficiaries of an existing program, it was always to their benefit to advocate delay. Now, they plead that support today is not in compliance with the 1996 Act. The Commission must make a specific finding that the current system fulfills all of the goals outlined in the 1996 Act. The 1996 Act is consistent with this position in encouraging competition in all sectors of America.

I. The Commission Must Not Allow Rural Local Exchanges Carriers to Thwart the Intent of Congress

The 1996 Act provides "for a pro-competitive, deregulatory national policy".⁴ In adopting the Act, Congress provided for competition to extend throughout the country. However, local exchange carriers (LECs) throughout this proceeding and related proceedings at the state level plead to regulators that the current system as adopted by the Commission is not consistent with the 1996 Act. Specifically they state that the support they receive today is not "specific, sufficient and predictable." This is

⁴Conference Report at 1.

absurd. The support they receive today is the exact same amount of support they received prior to the passage of the 1996 Act for rural ILECs. The Commission continued the current universal service system and the amounts the rural ILECs receive. The only changes currently adopted by the Commission allow the payments to become portable in the event a competitive LEC (CLEC) is designated as an eligible telecommunications carrier (ETC) under 214(e)(1) of the Communications Act. 214(e)(1) defines eligible telecommunications carriers as

(1) ELIGIBLE TELECOMMUNICATIONS CARRIERS. - A common carrier designated as an eligible telecommunications carrier under paragraph (2) or (3) shall be eligible to receive universal service support in accordance with section 254 and shall, throughout the service area for which designation is received -

(A) offer the services that are supported by Federal universal service support mechanisms under section 254(c) either using its own facilities or a combination of its own facilities and resale of another carrier's services (including the services offered by another eligible telecommunications carrier); and

(B) advertise the availability of such services and the charges therefor using media of general distribution.⁵

In the past, the ILECs proposed to include carrier of last resort responsibilities, services quality standards⁶, and

⁵Section 213(e).

⁶As the Commission is well aware, the service standards of competitors are usually higher than that of the incumbent. By promoting competition, customers are given the free choice to determine which carrier fulfills their individual needs.

serving all areas on a facilities basis as criteria to become an eligible telecommunications carrier. These proposals are contrary to the Act. The new basis of attack on competition in rural areas are pleas that the current federal universal service system and access charge system is not "sufficient, specific and predictable." These arguments are being made by the ILECs to continue their rural exemption, discouraging competitors who wish to serve rural America and delaying competition until the next century.⁷

This has impacted GCI greatly. On April 3, 1997, GCI sent letters to Telephone Utilities of Alaska (TUA), Telephone Utilities of the Northland (TUNI) and Fairbanks Municipal Utilities System (FMUS)⁸ requesting interconnection under 251(a)-(c). All of these companies are rural telephone companies (RTCs) under the 1996 Act. After several months of negotiating, GCI filed a petition with the Alaska Public Utilities Commission (APUC) requesting the APUC to terminate the rural exemption of the ILECs and requesting arbitration on all outstanding issues. The APUC determined that it would solely deal with the rural

⁷The Commission has proposed to make changes to the universal service system for rural ILECS for implementation in 2001. By pleading that the current system is not consistent with the 1996 Act, these carriers hope to delay competition at least until 2001.

⁸FMUS was acquired by Pacific Telecom, Inc. (PTI) and changed its name to PTI Communications of Alaska,, Inc. (PTIC).

exemption issue and delay the arbitration process.⁹ A hearing was held in December, 1997. TUA, TUNI and PTIC claimed that the current universal service system as confirmed in the Commission's Report and Order was not "sufficient, specific and predictable" and that the APUC could not lift its rural exemption until the Commission and the APUC reformed universal service and the access charge structure. Witnesses confirmed that this delay could last into the next century. The APUC determined that the universal service system was not "sufficient, specific and predictable."¹⁰

The Commission should confirm in its report to Congress that the current support for rural ILECs is consistent with the requirements outlined in Section 254 and specifically state that the support is "sufficient, specific and

⁹In the Matter of GCICC for Termination of the Rural Exemption of and Arbitration With PTI Communications of Alaska, Inc., Docket U-97-83, Order No. 1, dated October 23, 1997; In the Matter of GCICC for Termination of the Rural Exemption of and Arbitration With Telephone Utilities of Alaska, Inc., Docket U-97-143, Order No. 1, dated October 23, 1997; and, In the Matter of GCICC for Termination of the Rural Exemption of and Arbitration With Telephone Utilities of the Northland, Inc., Docket U-97-144, Order No. 1, dated October 23, 1997.

¹⁰In the Matter of GCICC for Termination of the Rural Exemption of and Arbitration With PTI Communications of Alaska, Inc., Docket U-97-83, Order No. 2, dated January 8, 1998; In the Matter of GCICC for Termination of the Rural Exemption of and Arbitration With Telephone Utilities of Alaska, Inc., Docket U-97-143, Order No. 2, dated January 8, 1998; and, In the Matter of GCICC for Termination of the Rural Exemption of and Arbitration With Telephone Utilities of the Northland, Inc., Docket U-97-144, Order No. 2, dated January 8, 1998.

predictable." The Commission should also note that the support will change over time as outlined in the 1996 Act. Otherwise, rural ILECs will continue to thwart competition in rural America.

Incumbent LECs, particularly rural telephone companies have several protections in the 1996 Act.¹¹ Unlike other areas, competitive carriers are required to serve the entire study area of a rural telephone company. Many rural telephone company study areas encompass an entire state and contain many non-contiguous areas. Service areas for cellular and PCS providers differ dramatically from the LEC. However, GCI is willing to provide service to the entire study area of the rural telephone company as long as it must comply solely with the provision of service throughout the area on a combined facilities, including unbundled network elements, and resale basis as outlined in 214(e)(1)(A).

II. The 1996 Act Does Not Provide Special Considerations for Rural Telephone Companies Who Face Competition

Many of the rural telephone companies plead that the 1996 Act gives them special universal service consideration. They state that competitive carriers should not be allowed to receive support of any kind or that the support should either be based on proxies or on the costs of the

¹¹As discussed below, these advantages were not instituted to prevent competition in rural America. They were enacted so that rural telephone companies would not have to comply with the requirements of 251 and 252 of the 1996 Act if a competitive carrier did not request interconnection.

competitive carrier. They do not support payments to competitive carriers based on the costs of the incumbent LEC. However, basing payments on the costs of the incumbent LEC implements the principle of competitive neutrality and constrains the excessive costs of the incumbent without causing severe financial impact on the incumbent. By paying support to the competitive carrier based on the incumbents costs, the over investment tendencies of the incumbent will be constrained by the marketplace over time. This will not happen overnight, but the process will produce viable LECs that choose to continue to serve rural America under this new pro-competitive system. Section 254 was not designed to keep the incumbent LEC whole, but designed to ensure service is available through competition and supported where needed.¹²

Support must be collected and distributed in a competitively neutral manner. As outlined in its Report and Order, the Commission adopted a system that is portable and payable to the customer's provider of choice. The Commission adopted a system which starts with the ILECs reported costs and converts those costs to a per line payment. If the CLEC is providing service through unbundled elements the CLEC would receive support up to the amount of

¹²Even if competition is allowed in an area served by a RTC, that rural ILEC does not lose any universal service support until the state commission designates the CLEC as an ETC.

the unbundled element and the ILEC would receive any additional support. For example, if unbundled loops are priced at \$50 a month and the ILEC currently receives \$100 a month in support, the ILEC would still receive the total amount it currently receives through the combined payments of the CLEC and USF. Alternatively if the price per unbundled loop was \$200 a month, the CLEC would receive \$100 from USF and pay the ILEC \$200.

Many rural companies have claimed that they are special and that the 1996 Act specifically provides protections for rural ILECs that are not provided for potential competitors; they also claim that Section 254 is a safety net for rural carriers, or that Congress had a special concern and enacted protections to preserve universal service in rural areas.

Congress is concerned about service to rural America. However, rural telephone companies were not exempted from competition or required to be kept whole. Rural telephone companies were given exemptions from complying with 251(c) of the Act because they pleaded that competition would not come to rural areas and that they would have to seek suspensions and modifications of the rules via complex regulatory proceedings until a potential competitor surfaced. Therefore, a compromise was reached to require interconnection only upon a bona fide request. This was

fashioned after the equal access requirement.¹³ Contrary to the assertions of the rural telephone companies, Congress did not intend to protect rural telephone companies from competition.¹⁴

Further, the Supreme Court has determined that these companies are not entitled to recovery of all their historical costs. In Duquesne Light Co. v. Barasch, the Supreme Court dismissed a takings claim and said that rates can be based on "actual present value of the assets employed in the public service."¹⁵ The Court rejected arguments that the Constitution mandates recovery of all historical costs.¹⁶

¹³Originally, the independent LECs opposed the equal access requirements.

¹⁴Also, Congress did not support abandonment of the principals outlined in 251(b). Congress allowed for suspensions and modifications of the requirements of 251(b) and (c) for telephone companies with less than 2% of the access lines in the country, i.e., everyone except the BOCs and GTE. These suspensions or modifications of the requirements are mainly to allow for more time to comply with the standards so as to avoid a significant adverse impact on users generally, to avoid imposing a requirement that is unduly economically burdensome or to avoid imposing a requirement that is technically infeasible and is consistent with the public interest. A situation might arise when the LEC is waiting for a manufacturer's upgrade of a switch to perform a function such as number portability. However, the Commission could impose alternative obligations such as RFC or DID in the interim.

¹⁵488 U.S. 299, 308 (1989).

¹⁶Id at 315-16.

III. Competition is the Best Vehicle to Ensure Deployment of New and Advanced Technologies

In 1995, the Commission concluded the Alaska Joint Board¹⁷ proceeding that terminated the subsidy received by Alascom to provide interexchange facilities and services to Alaska. Alascom received subsidies over a twenty year period and the Alaska Bush¹⁸ continues to be the only place in America where interexchange carriers cannot build duplicative satellite earth station facilities.¹⁹ The citizens that live in the Alaska bush receive the worst telephone service in the United States. Today, the same earth stations with analog technology that were installed in the Alaska bush in the late 70's and early 80's are still in operation, even though Alascom received substantially over \$1 billion dollars in subsidy to provide service. It is difficult to talk to these locations, and sometimes impossible to send faxes in and out of these locations

¹⁷In re Application of Alascom, Inc., AT&T Corporation and Pacific Telecom, Inc. for Transfer of Control of Alascom, Inc. from Pacific Telecom, Inc. to AT&T Corporation, File Nos. W-P-C-7037, 6520, Order And Authorization, FCC No. 95-334 (released August 2, 1995); Integration of Rates and Services, 9 FCC Rcd 3023 (1994), adopting Final Recommended Decision, 9 FCC Rcd 2197 (1994).

¹⁸The Alaska Bush is defined as places with less than a thousand people with an existing MTS satellite earth station. Policies Governing the Ownership of Domestic Satellite Earth Stations in the Bush Communities of Alaska, 96 FCC 2d 522, 541 (1984).

¹⁹Given the fact that these villages cannot be reasonably served with any other technology except satellite earth stations, there is basically a prohibition on entry in the Alaska bush.

because of the antiquated technology. Due to the lack of competition or even the threat of competition, service to these locations is disastrous.

GCI has teamed with several companies to develop a bush earth station technology that is low cost and easily upgradeable that could replace this antiquated system. Scientific Atlanta and GCI have developed a small DAMA earth station which will improve service to the Alaska bush. GCI has fought for over 7 years to open bush Alaska to competitive service.²⁰ GCI has recently received from the Commission a partial waiver that will allow it to deploy and operate up to fifty DAMA earth stations in bush Alaska.²¹ In response, Alascom has announced that it will finally deploy new technology in the bush. The Alaska situation for interexchange service should remind the Commission and Congress that subsidies for competitive services are unnecessary and should not be permitted.²² The Commission went through a twelve year process to eliminate the subsidy

²⁰GCI Petition for Rulemaking, RM-7246, filed January 10, 1990.

²¹Petition of General Communication, Inc. for a Partial Waiver of the Bush Earth Station Policy, File No. 122-SAT-WAIV-95, released January 30, 1996. GCI is allowed to construct and operate up to 50 earth stations for a period of two years.

²²The Alaska ILECs have delayed interconnection with GCI that would enable GCI to provide competitive interexchange service. The ILECs do not want competitors in their service area because believe their universal service support will be threatened.

Alascom claimed as its right and as necessary to provide service to remote locations in Alaska. Obviously, Alascom did not use the monies received over the years to improve service in these areas. They used the support in competitive areas to try and drive out competition.²³ Currently, interexchange services are provided in a competitive manner and not subsidized.²⁴ Competition will

²³GCI began service in Anchorage in 1982 after a multi-year regulatory battle with Alascom just to enter the market. Alascom said that GCI would never expand beyond Anchorage. As GCI expanded to each community, Alascom would state that GCI would not expand any further because the remaining markets were uneconomic. However, GCI continued to expand and now serves over 90% of the access lines in the state. As GCI expanded, Alascom would upgrade their facilities in each community from analog to digital and begin to offer customer service in locations where customer's had rarely seen an Alascom representative. The same claims about competitive expansion and low margin markets are now being made by the incumbent LECs. The same results can occur. Competition should not only be allowed, but wholeheartedly encouraged in rural areas so that consumers can benefit.

²⁴Carriers should not be allowed to expand the subsidy system. United Utilities, Inc. (UUI) proposed to put interexchange services into the universal service. UUI proposed to provide "local service" to four remote locations using satellite technology. The four locations, three of which are sites of a multi-million dollar fish hatchery, are separated by up to 30 miles and would be connected, via satellite, through facilities in Anchorage, 40 miles away. UUI proposed to categorize all the equipment from each hatchery, over the satellite, and back to Anchorage as "local loop" eligible for USF support. The Audits and Accounting Division of the Commission has determined that the equipment outlined by UUI should be classified in Category 4.23, All Other Interexchange Circuit Equipment. See, Letter from Kenneth P. Moran, Chief, Audit and Accounting Division to William K. Keane, dated July 15, 1994. UUI has asked the Division to reconsider its ruling. The Alaska Public Utilities Commission (APUC) determined that the service proposed by UUI would be interexchange service. The APUC also stated that the four locations do not constitute a community because they are not in the same location under the same

ensure that advanced services are deployed in rural America.

IV. All Telecommunications Carriers Should Be Eligible to Receive Support for Providing Service to Rural Health Care Providers

The Commission must allow all carriers, including those not designated as eligible telecommunications carriers (ETCs) to receive support for universal service provided to rural health care providers. Otherwise, no carrier in Alaska will be capable of providing the services needed by the rural health care providers. The Commission has the ability²⁵ to adopt this policy pursuant to the Telecommunications Act.

Under the process outlined in the current rules, in Alaska, no carrier could be designated an ETC for purposes of serving rural health care providers. The services needed by the rural health care provider are primarily interexchange service between the village and the regional

government, they are separated by as much as 40 miles and that commercial enterprises do not constitute a community. The APUC further stated that universal service is "not void of limitations." They concurred with the general guidelines previously established in Alaska that subsidized telecommunications services should occur in communities with a minimum population of 25. See, Application of United Utilities, Inc., APUC Docket U-94-1, Order No. 8, dated September 11, 1995. Any definition for universal service must not be overly inclusive and should not include interexchange costs and other costs that should not be subsidized by USF.

²⁵If the Commission determines it does not have the necessary authority to adopt this request, it should consider both GCI's and the APUC's petitions for reconsideration of this matter as requests for waiver of 54.201(a)(2) so that rural health care providers in the State of Alaska can receive the services outlined in the Telecommunications Act of 1996.

center of Anchorage. The ILECs do not provide any toll service. This service is provided exclusively by the interexchange carriers, GCI and Alascom. The ILECs are beginning to go in the toll business in Alaska. However, these services are provided exclusively through a separate corporation who could not separately qualify for designation as an ETC.

The policy that only an ETC receive support for services provided to rural health care providers is inconsistent with the Communications Act and is contrary to the public interest.

Section 254(h)(1)(A) of the Communications Act states

Health Care Providers For Rural Areas - A telecommunications carrier shall, upon receiving a bona fide request, provide telecommunications services which are necessary for the provision of health care services in a State, including instruction relating to such services, to any public or nonprofit health care provider that services persons who reside in rural areas in that State at rates that are reasonably comparable to rates charges for similar services in urban areas in that State. A telecommunications carrier providing service under this paragraph shall be entitled to have an amount equal to the difference, if any, between the rates for services provided to hold care providers for rural areas in a State and the rates for similar services provided to other customers in comparable rural areas in that State treated as a service obligation as a part of its obligation to participate in the mechanism to preserve and advance universal service. (Emphasis added).

Congress specifically stated that a telecommunications carrier was eligible for the offset against its universal service

obligation. Congress did not mandate that only eligible telecommunications carriers would be eligible to provide the service to rural health care providers. The language is similar to that adopted for schools and libraries.²⁶ The conference report is even more explicit.

New subsection (h)(1)(A) provides that any telecommunications carrier shall, upon a bona fide request, provide telecommunications services necessary for the provision of health care services to any health care provider serving persons who reside in rural areas. Emphasis added.²⁷

Under the rules, telecommunications carriers are not required to become eligible telecommunications carriers to provide service to schools and libraries and to receive support. The Commission cannot adopt two different interpretations for the provisioning of universal service to rural health care providers and schools and libraries by telecommunications carriers. As mandated by Congress, the Commission must change its rule and allow all telecommunications carriers to provide universally supported services to rural health care providers.

Conclusion

The Commission should confirm that the current universal service system is "specific, sufficient, and predictable" and that rural telephone companies are not protected from competition. The Commission should further confirm that IXCs can

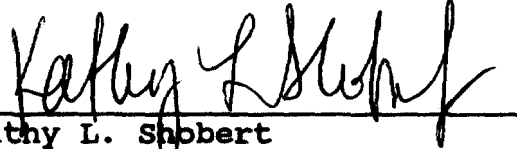
²⁶Section 254(h)((1)(B) directs "all telecommunications carriers" to provide service upon a bona fide request.

²⁷Conference Report 104-458, page 133.

be classified as eligible telecommunications carriers for purposes of serving rural health care providers.

Respectfully submitted,

GENERAL COMMUNICATION, INC.

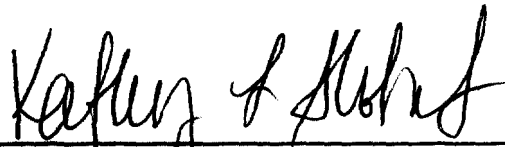
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Kathy L. Shobert
Director, Federal Affairs
901 15th St., NW, Suite 900
Washington, D.C. 20005
(202) 842-8847

January 26, 1998

STATEMENT OF VERIFICATION

I have read the foregoing, and to the best of my knowledge, information and belief there is good ground to support it, and that it is not interposed for delay. I verify under penalty of perjury that the foregoing is true and correct. Executed this 26th day of January, 1998.

A handwritten signature in dark ink, appearing to read "Kathy L. Shobert", written over a horizontal line.

Kathy L. Shobert
Director, Federal Affairs
901 15th St., NW, Suite 900
Washington, D.C. 20005
(202) 842-8847

CERTIFICATE OF SERVICE

I, Kathy L. Shobert, do hereby certify that on this 26th day of January, 1998, a copy of the foregoing was sent by first class U.S. mail, postage prepaid, to the parties listed below:

**The Honorable William Kennard
Federal Communications Commission
1919 M Street, N.W. -- Room 814
Washington, D.C. 20554**

**The Honorable Harold W. Furchtgott-Roth
Federal Communications Commission
1919 M Street, N.W. -- Room 844
Washington, D.C. 20554**

**The Honorable Susan Ness
Federal Communications Commission
1919 M Street, N.W. -- Room 832
Washington, D.C. 20554**

**The Honorable Julia Johnson
Florida Public Service Commission
Capital Circle Office Center
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850**

**The Honorable Kenneth McClure
Missouri Public Service Commission
301 W. High Street, Suite 530
Jefferson City, MO 65102**

**The Honorable Sharon L. Nelson
Washington UTC
P.O. Box 47250
Olympia, WA 98504-7250**

**The Honorable Laska Schoenfelder
South Dakota Public Utilities Commission
500 E. Capital Avenue
Pierre, SD 57501**

Martha S. Hogerty
Public Counsel for the State of Missouri
P.O. Box 7800
Harry S. Truman Building, Room 250
Jefferson City, MO 65102

Deborah Dupont, Federal Staff Chair
Federal Communications Commission
2000 L Street, N.W., Suite 257
Washington, D.C. 20036

Paul E. Pederson, State Staff Chair
Missouri Public Service Commission
P.O. Box 360
Truman State Office Building
Jefferson City, MO 65102

Eileen Benner
Idaho Public Utilities Commission
P.O. Box 83720
Boise, ID 83720-0074

Charles Bolle
South Dakota Public Utilities Commission
State Capital, 500 E. Capital Avenue
Pierre, SD 57501-5070

Lorraine Kenyon
Alaska Public Utilities Commission
1016 West Sixth Avenue, Suite 400
Anchorage, AK 99501

Debra M. Kriete
Pennsylvania Public Utilities Commission
P.O. Box 3265
Harrisburg, PA 17105-3265

Mark Long
Florida Public Service Commission
2540 Shumard Oak Blvd.
Gerald Gunter Building
Tallahassee, FL 32399-0850

Samuel Loudenslager
Arkansas Public Service Commission
P.O. Box 400
Little Rock, AR 72203-0400

Sandra Makeeff
Iowa Utilities Board
Lucas State Office Building
Des Moines, IA 50319

Philip F. McClelland
Pennsylvania Office of Consumer Advocate
1425 Strawberry Square
Harrisburg, Pennsylvania 17120

Michael A. McRae
D.C. Office of the People's Counsel
1133 15th Street, N.W. -- Suite 500
Washington, D.C. 20005

Terry Monroe
New York Public Service Commission
Three Empire Plaza
Albany, NY 12223

Mark Nadel
Federal Communications Commission
1919 M Street, N.W., Room 542
Washington, D.C. 20554

Lee Palagyi
WUTC
P.O. Box 47250
Olympia, WA 98504-7250

Jeanine Poltronieri
Federal Communications Commission
2000 L Street, N.W., Suite 257
Washington, D.C. 20036

James Bradford Ramsay
NARUC
1201 Constitution Avenue, N.W.
Washington, D.C. 20423

Jonathan Reel
Federal Communications Commission
2000 L Street, N.W., Suite 257
Washington, D.C. 20036

Brian Roberts
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102-3298

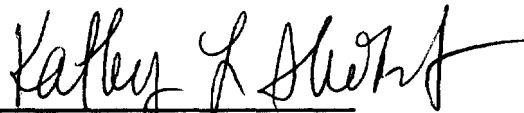
Gary Seigel
Federal Communications Commission
2000 L Street, N.W., Suite 812
Washington, D.C. 20036

Pamela Szymczak
Federal Communications Commission
2000 L Street, N.W., Suite 257
Washington, D.C. 20036

Whiting Thayer
Federal Communications Commission
2000 L Street, N.W., Suite 812
Washington, D.C. 20036

Alex Belinfante
Federal Communications Commission
1919 M Street, N.W.
Washington, D.C. 20554

Larry Povich
Federal Communications Commission
1919 M Street, N.W.
Washington, D.C. 20554


Kathy L. Shober